

Dragon Products Company, Inc.) **DEPARTMENTAL**
Androscoggin County) **FINDINGS OF FACT AND ORDER**
Lewiston, Maine) **AIR EMISSION LICENSE**
A-534-71-F-R

After review of the air emissions license application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

Dragon Products Company, Inc. (Dragon) of Lewiston, Maine has applied to renew their Air Emission License, permitting the operation of emission sources associated with their concrete batch plant and facility boilers.

B. Emission Equipment

Dragon is authorized to operate the following air emission units:

Fuel Burning Equipment

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Fuel Type</u>	<u>Post Combustion Ctrl Eqpmnt</u>
Boiler 1	4.5	Nat. Gas	none
Boiler 2	4.5	Nat. Gas	none
Boiler 3*	0.24	Nat. Gas	none
Boiler 4*	0.24	Nat. Gas	none

* Boilers 3 and 4 are considered to be insignificant activities pursuant to Chapter 115 Appendix B of the Maine Air Regulations and are therefore noted for inventory purposes only.

Concrete Plant

<u>Equipment</u>	<u>Process Rate (cubic yards/hour)</u>	<u>Control Devices</u>	<u>Stack ID</u>
Concrete Batch Plant	110.0	fabric filter	n/a

Process Equipment

<u>Equipment</u>	<u>Pollution Control Equipment</u>
cement silos 1, 2, 3, 4	fabric filters

C. Application Classification

The application for Dragon does not include the licensing of increased emissions or the installation of new or modified equipment, therefore the license is considered to be a renewal of current licensed emission units only. This renewal is classified as a minor source and has been processed as such.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent best practical treatment (BPT), as defined in Chapter 100 of the Air Regulations. Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas. Descriptions of the applicable requirements are provided below under the appropriate headings.

B. Existing Emission Units

BPT for existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

- the existing state of technology;
- the effectiveness of available alternatives for reducing emissions from the source being considered; and
- the economic feasibility for the type of establishment involved.

Dragon Products Company, Inc.
Androscoggin County
Lewiston, Maine
A-534-71-F-R

) **DEPARTMENTAL**
) **FINDINGS OF FACT AND ORDER**
) **AIR EMISSION LICENSE**
3

(1) Boilers 1 and 2:

- a. Dragon operates Boilers 1 and 2 primarily for facility hot water and heating needs. Boilers 1 and 2 have a maximum design heat input capacity of 4.5 MMBtu/hr each, firing Natural Gas fuel, therefore Boilers 1 and 2 are **not** subject to EPA New Source Performance Standards (NSPS) Subpart Dc, for boilers with a heat input of 10 MMBtu/hr or greater and manufactured after June 9, 1989.
- b. Based on the relatively small size of Boilers 1 and 2, and the quantity of pollutants that could potentially be emitted, it is determined by the Bureau of Air Quality that any add on pollution control device would be economically unjustified. Therefore, BPT for Boilers 1 and 2 shall be the firing of Natural Gas as fuel.
- c. Visible emissions from Boilers 1 and 2 shall not exceed 10% opacity on a six minute block average basis for more than two (2) six (6) minute block average in a 3- hour period pursuant to Chapter 101.
- d. BPT emission limits are derived from the following:
 - PM – BPT limit of 0.05 lb/MMBtu.
 - SO₂ – Mass Balance
 - NO_x, CO and VOC – AP-42

(2) Concrete Batch Plant and Cement Silos

- a. To meet the requirements of BPT for control of particulate matter (PM) emissions from the cement silo, particulate emissions shall be vented through a baghouse maintained for 99% removal efficiency.
- b. Visible emissions from the cement silo baghouse are limited to 10% opacity on a six minute block average basis for more than one (1) six (6) minute block average in a 1- hour period. Dragon shall take corrective action if visible emissions from the baghouse exceed 5% opacity pursuant to Chapter 101.
- c. All components of the concrete batch plant shall be maintained so as to prevent PM leaks.
- d. Visible emissions from concrete batching operations shall not exceed 20% opacity on a six minute block average basis for more than one (1) six (6) minute block average in a 1- hour period.

Dragon Products Company, Inc.
Androscoggin County
Lewiston, Maine
A-534-71-F-R

)
)
)
4

**DEPARTMENTAL
FINDINGS OF FACT AND ORDER
AIR EMISSION LICENSE**

C. Facility Emissions and Fuel Use Caps

- a. Dragon shall not exceed the use of 3,000,000 scf per year of Natural Gas fuel, based on a 12 month rolling total.
- b. Based on the above limit, total facility annual emissions shall not exceed the following:

Total Allowable Annual Emissions for the Facility
(used to calculate the annual license fee)

Pollutant	Tons/year
PM	0.08
PM ₁₀	0.08
SO ₂	0.01
NO _x	0.15
CO	0.13
VOC	0.01

III. AMBIENT AIR QUALITY ANALYSIS

According to the Maine Regulations Chapter 115, the level of air quality analyses required for a renewal source shall be determined on a case-by-case basis. Modeling and monitoring are not required of a renewal if the total emissions of any pollutant released do not exceed the following:

<u>Pollutant</u>	<u>TPY</u>
PM	50
PM ₁₀	25
SO ₂	50
NO _x	100
CO	250

Based on the emissions listed above, Dragon is below the emissions level required for modeling and monitoring.

Dragon Products Company, Inc.
Androscoggin County
Lewiston, Maine
A-534-71-F-R

)
)
)
5

DEPARTMENTAL
FINDINGS OF FACT AND ORDER
AIR EMISSION LICENSE

ORDER

Based on the above Findings and subject to conditions listed below the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-534-71-F-R, subject to the following conditions:

- (1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions.
- (2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 115.
- (3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both.
- (4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request.

Dragon Products Company, Inc.
Androscoggin County
Lewiston, Maine
A-534-71-F-R

)
)
)
6

DEPARTMENTAL
FINDINGS OF FACT AND ORDER
AIR EMISSION LICENSE

- (5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 MRSA §353.
- (6) The license does not convey any property rights of any sort, or any exclusive privilege.
- (7) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions.
- (8) The licensee shall maintain sufficient records, to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request.
- (9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for the renewal of a license or amendment shall not stay any condition of the license.
- (10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license.
- (11) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:
 - (i) perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:
 - a. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions; or
 - b. pursuant to any other requirement of this license to perform stack testing.
 - (ii) install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and

Dragon Products Company, Inc.
Androscoggin County
Lewiston, Maine
A-534-71-F-R

)
)
)
7

DEPARTMENTAL
FINDINGS OF FACT AND ORDER
AIR EMISSION LICENSE

- (iii) submit a written report to the Department within thirty (30) days from date of test completion.
- (12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate emissions in excess of the applicable standards, then:
- (i) within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and
 - (ii) the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and
 - (iii) the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.
- (13) Notwithstanding any other provision in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement.
- (14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emissions and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation.
- (15) Upon written request of the Department, the licensee shall establish and maintain such records, make such reports, install, use and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such manner as the Department shall

Dragon Products Company, Inc.
Androscoggin County
Lewiston, Maine
A-534-71-F-R

)
)
)
8

DEPARTMENTAL
FINDINGS OF FACT AND ORDER
AIR EMISSION LICENSE

prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status.

(16) Boilers 1 and 2

a. Emissions from each boiler shall not exceed the following:

Equipment		PM	PM ₁₀	SO ₂	NO _x	CO	VOC
Boiler 1	lb/hr	0.23	0.23	0.01	0.44	0.37	0.02
Boiler 2	lb/hr	0.23	0.23	0.01	0.44	0.37	0.02

b. Boilers 1 and 2 shall not exceed a particulate emission (PM) limit of 0.05 lb/MMBtu.

c. Visible emissions from Boilers 1 and 2 shall not exceed 10% opacity on a six minute block average basis for more than two (2) six (6) minute block average in a 3- hour period pursuant to Chapter 101.

(17) Concrete Batch Plant

a. Particulate emissions from the cement silo shall be vented through a baghouse and all components of the batch plant shall be maintained so as to prevent PM leaks.

b. To document maintenance of the cement silo baghouse, the licensee shall keep a maintenance log recording the date and location of all bag failures as well as all routine maintenance. The maintenance log shall be located at the facility whenever the facility is in operation.

c. Visible emissions from the cement silo baghouse are limited to 10% opacity on a six minute block average basis for more than one (1) six (6) minute block average in a 1- hour period. Dragon shall take corrective action if visible emissions from the baghouse exceed 5% opacity pursuant to Chapter 101.

d. Visible emissions from concrete batching operations shall not exceed 20% opacity on a six minute block average basis for more than one (1) six (6) minute block average in a 1- hour period.

Dragon Products Company, Inc.
Androscoggin County
Lewiston, Maine
A-534-71-F-R

)
)
)
9
**DEPARTMENTAL
FINDINGS OF FACT AND ORDER
AIR EMISSION LICENSE**

(18) Stockpiles and Roadways

Potential sources of fugitive PM emissions including material stockpiles and unpaved roadways shall be controlled by wetting with water, with calcium chloride, or other methods as approved by the Bureau of Air Quality. Visible Emissions shall not exceed an opacity of 20%, except for no more than 5 minutes in any 1-hour period. Compliance shall be determined by an aggregate of the individual 15-second opacity observations which exceed 20% in any 1-hour period.

(19) Fuel Use Cap

a. Dragon shall not exceed the use of 3,000,000 scf per year of Natural Gas fuel, based on a 12 month rolling total.

b. Dragon shall maintain fuel purchased records and a 12 month rolling total of fuel use in order to document compliance with the limit found in 18 (a) above.

(20) Dragon shall pay the annual air emission license fee within 30 days of **February 28th** of each year. Pursuant to 38 MRSA §353-A, failure to pay this annual fee in the stated timeframe is sufficient grounds for revocation of the license under 38 MRSA §341-D, subsection 3.

(21) The term of this order shall be for five (5) years from the signature date below.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2004.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAWN R. GALLAGHER, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 5/30/03

Date of application acceptance: 6/16/03

Date filed with Board of Environmental Protection: _____

This order prepared by Jonathan Voisine, Bureau of Air Quality